



MARK B HORTON, MD, MSPH
Director

State of California—Health and Human Services Agency
California Department of Public Health



ARNOLD SCHWARZENEGGER
Governor

October 1, 2007

Ms. Pamela C. Creedon, Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

**TENTATIVE WASTE DISCHARGE REQUIREMENTS NPDES PERMIT NO. CA0079391
CITY OF JACKSON WASTEWATER TREATMENT PLANT, AMADOR COUNTY**

The Department is in receipt of a copy of the letter of September 18, 2007, from the East Bay Municipal Utility District to Kenneth Landau regarding the tentative waste discharge requirements in NPDES Permit No. CA0079391 for the City of Jackson. The letter is basically focused on a key concept in the public health program related to the provision of drinking water that is safe, wholesome, and potable. That concept is Source Water Protection. Although the Department has always directed domestic water utilities toward the use of the highest quality, best available sources when selecting water sources intended to meet potable water demands, that concept was formalized by the Federal government in the 1996 Amendments to the Safe Drinking Water Act. In response to those amendments, the United States Environmental Protection Agency initiated its Source Water Protection program, and the Department, as a primacy agency, adopted Source Water Protection as an element of the California Safe Drinking Water program.

In its letter of September 18, 2007, the East Bay Municipal Utility District (EBMUD) emphasizes its commitment to Source Water Protection in its statement, "The District is committed to protecting the Mokelumne River water quality from degradation and will take all actions necessary to protect the public health of its customers."

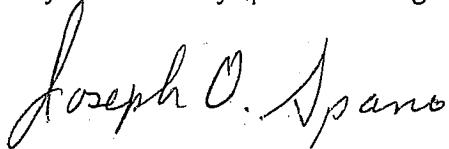
The EBMUD is a large entity with extensive resources. In contrast, the domestic water customers in the Jackson Valley are few in number and have very limited resources that prevent them from making a similar commitment to protect their source water, Jackson Creek, from degradation. However, the public health of the domestic water consumers in the Jackson Valley deserves to receive protection equal to that afforded to water consumers in the service area of EBMUD.

The Regional Water Quality Control Board (RWQCB) should also consider that the average annual discharge of the City of Jackson of about 600 acre feet of treated wastewater is only diluted by an average annual flow of from 10,000 to 12,000 acre feet of water that flow in Jackson Creek on the way to Lake Amador. In contrast, the average annual flow in the Mokelumne River is about 700,000 acre feet which would afford over 50 times as much wastewater dilution of the Jackson discharge as is possible in Jackson Creek. As a result, the Jackson discharge has an enormously greater impact on the water stored in Lake Amador, with its capacity of 22,000 acre feet than the same discharge would have on the Mokelumne River system and Pardee Reservoir, which has a storage capacity of 209,000 acre feet. Therefore, while the

Department agrees with EBMUD in its opposition to the discharge of the City of Jackson's wastewater into the Mokelumne River, it is worth noting that the same discharge into Jackson Creek, without at least 20 to 1 dilution, greatly enhances the public health risks related to the very discharge that EBMUD opposes into the Mokelumne River.

The Department is in favor of water recycling and urges the RWQCB to adopt an approach that would maximize the recycling of the City's treated wastewater. Such an approach would also conserve alternate water resources that would be offset by the recycling. Perhaps some of the fresh water saved through the substitution of recycled water could be released into Jackson Creek to benefit an ecosystem that is now subjected to a flow of 100% wastewater effluent during the driest months of each year. If complete recycling of the discharge is not possible, the discharge to Jackson Creek should be allowed only during the wet season when adequate (20 to 1) dilution is available. During the rest of the year, a discharge to land should be required of the City of Jackson.

If you have any questions regarding this letter, contact me at (209) 948 3816.



Joseph O. Spano, P.E.
District Engineer
Southern California Branch
Drinking Water Field Operations

cc: Kenneth Landau, Regional Water Quality Control Board
Richard Haberman, Department of Public Health
Mike Isreal, Amador County Environmental Health Department
Tom Hoover, Jackson Valley Irrigation District
Diana Messina, Regional Water Quality Control Board
Mike Daly, City of Jackson
Eileen M. White, East Bay Municipal Utility District